

Exhibit 27

**Transcript of the Testimony of
Karla Perez**

Date:

June 16, 2018

Case:

STATE OF TEXAS V. UNITED STATES OF AMERICA

1 Karla Perez

2 June 16, 2018

3
4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE SOUTHERN DISTRICT OF TEXAS
6 BROWNSVILLE DIVISION
7

8 STATE OF TEXAS, ET. AL.)
9)
10 PLAINTIFFS,)
11)
12 V.) CASE NO. 1:18-cv-00068
13)
14 UNITED STATES OF AMERICA,)
15 ET. AL.,)
16)
17 DEFENDANTS,)
18)
19 AND)
20)
21 KARLA PEREZ, ET. AL.,)
22)
23 DEFENDANT-INTERVENORS.)
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17 ORAL DEPOSITION OF KARLA PEREZ

18 June 16, 2018

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1 ORAL DEPOSITION OF KARLA PEREZ, produced as a
2 witness at the instance of the Plaintiffs and duly
3 sworn, was taken in the above-styled and numbered
4 cause on June 16, 2018, from 11:06 a.m. to 1:55 p.m.,
5 before Mia Cieslar, Certified Shorthand Reporter in
6 and for the State of Texas, reported by computerized
7 machine shorthand, at the offices of the Attorney
8 General, Consumer Protection Division, 808 Travis
9 Street, Suite 1520, Houston, Texas, pursuant to the
10 Federal Rules of Civil Procedure and the provisions
11 stated on the record or attached hereto.

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1 A. Yes.

2 Q. All right. Then the next paragraph says,
3 There are a lot of obstacles for DACA students.

4 We talked about some of those obstacles,
5 right?

6 A. Yes.

7 Q. Okay. Know that many DACA -- many of the
8 DACA recipients she knew in Texas had not even
9 realized they could participate in the work study
10 program in the past.

11 Is that the -- does that refresh your
12 memory about what this article is about?

13 A. A work study program in Texas.

14 Q. Yeah. Do you --

15 A. Means to limit that to -- or exclude
16 undocumented students.

17 Q. Okay. So what do you know about the work
18 study program in Texas? Well, let me ask you another
19 question first.

20 Was this effort one of the efforts in
21 the 2017 legislative session that you participated in
22 advocating for or against this particular proposal?

23 A. Yes.

24 Q. Okay. So what do you know about the Texas
25 work study program?

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1 A. I know that it is a state program, not
2 federal which means that DACA recipients who have work
3 authorization could participate in it because it does
4 not -- it's not a federal program.

5 Q. Okay. And what were the efforts in 2017
6 related to that work study program?

7 A. There wasn't a -- an effort to require that
8 students participating in the state work study program
9 would qualify for federal financial aid which means
10 not undocumented students, including those who are
11 DACA recipients.

12 Q. Okay. You advocated against that proposal;
13 is that right?

14 A. Yes.

15 Q. And why did you advocate against that
16 proposal?

17 A. It's a state work program, it's not a federal
18 work program. And it didn't make sense to me. It --
19 it -- it seemed to me just another opportunity to
20 exclude DACA recipients from a program that they could
21 otherwise participate in because -- for those who have
22 work authorization. And it also was quite evident to
23 me that the legislature -- the legislator who
24 sponsored this proposal did not understand the nuances
25 of -- of this.

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REPORTER'S CERTIFICATE

ORAL DEPOSITION OF KARLA PEREZ

June 16, 2018

17 I, Mia Cieslar, Certified Shorthand Reporter
18 in and for the State of Texas, hereby certify that to
19 the following:

20 That the witness, KARLA PEREZ, was duly sworn
21 by the officer and that the transcript of the oral
22 deposition is a true record of the testimony given by
23 the witness;

24 I further certify that pursuant to FRCP Rule
25 30(f)(1) that the signature of the deponent:

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1 X was requested by the deponent or a party
2 before the completion of the deposition and returned
3 within 30 days from date of receipt of the transcript.
4 If returned, the attached Changes and Signature Page
5 contains any changes and the reasons therefor;

6 ____ was not requested by the deponent or a
7 party before the completion of the deposition.

8 I further certify that I am neither attorney
9 nor counsel for, related to, nor employed by any of
10 the parties in the action in which this testimony was
11 taken.

12 Further, I am not a relative or employee of
13 any attorney of record in this cause, nor do I have a
14 financial interest in the action. 

... .

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